

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CIVIL ACTION NO.: 3:20-cv-00370

LINDA GAIL THOMPSON, as Personal)
Representative of the Estate of JEROME)
THOMPSON,)

Plaintiff,)

CITY OF CHARLOTTE, OFFICER)
ADELAIDE KINSTLER in her Official and)
Individual capacity; OFFICER BRIAN E.)
KURCSAK in his Official and Individual)
capacity; OFFICER JOSEPH B. WILSON)
in his Official and Individual capacity;)
CHIEF JOHNNY JENNINGS in his)
Official as Chief of the Charlotte-)
Mecklenburg Police Department and)
Individual capacity; SHERIFF GARRY L.)
MCFADDEN in his Official and Individual)
capacity; DEPUTY LOUIS J. VENANT in)
his Official and Individual capacity;)
DEPUTY JOSEPH B. BREEDLOVE in his)
Official and Individual capacity;)
WELLPATH, LLC, EBONE DENISE)
ROBERTS in her individual capacity and as)
an agent of Wellpath, LLC; LAURA)
HOUSE in her individual capacity and as an)
agent of Wellpath, LLC; SAMANTHA)
ELLIOTT-MCLAREN in her individual)
capacity and as an agent of Wellpath, LLC;)
and "JOHN DOE" in his Official and)
Individual capacity;)

Defendants.)

DEFENDANT
EBONE ROBERTS'S MOTION FOR
JUDGMENT ON THE PLEADINGS

NOW COMES Defendant Ebone Roberts in a special appearance before the Court by and through undersigned counsel, and moves the Court, pursuant to Rule 12(c) of the Federal Rules of Civil Procedure, to dismiss with prejudice all counts against her in Plaintiff's Amended Complaint

through this Motion for Judgment on the Pleadings. Defendant Roberts incorporates by reference her Memorandum of Law filed contemporaneously with this Motion.

WHEREFORE, Defendant Roberts respectfully requests that the Court grant her Motion for Judgment on the Pleadings.

This the 7th day of June, 2021.

TEAGUE CAMPBELL DENNIS & GORHAM, LLP

By: /s/ Jennifer B. Milak

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CERTIFICATE OF SERVICE

This is to certify that the undersigned has this date served this **Defendant Ebone Roberts's Motion for Judgment on the Pleadings** in the above-entitled action upon all other parties to this cause by depositing a copy hereof, postage paid, in the United States mail addressed to said parties or by electronically filing using the CM/ECF system, which will send notification of such filing to the following:

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This the 7th day of June, 2021.

TEAGUE CAMPBELL DENNIS & GORHAM, LLP

BY: /s/ Jennifer Milak
Jennifer B. Milak
Attorneys for Ebone Roberts